

Caldwell, Greg

From: Wieberg, Chris
Sent: Thursday, April 23, 2015 12:41 PM
To: Caldwell, Greg; Sappington, Amanda
Subject: RE: Trenton Farms Grundy Co.

If she submits the request with justification we will work on a decision. I discuss with management.

Thanks,

Chris Wieberg
Chief, Operating Permits Section
Water Protection Program
573-526-5781

From: Caldwell, Greg
Sent: Thursday, April 23, 2015 12:08 PM
To: Sappington, Amanda; Wieberg, Chris
Subject: Trenton Farms Grundy Co.

Leeann Searcy, one of the neighbors called about requesting a public hearing for Trenton Farms CAFO application. I told her they could set up a meeting and request someone from the department come to the meeting or they could submit a request for a public hearing and the department may or may not grant that request. I emailed her the regulations for public hearings.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102
(573)-526-1426
(573)-522-9920 (fax)

Caldwell, Greg

From: Caldwell, Greg
Sent: Thursday, April 30, 2015 10:03 AM
To: 'ssimpson@pipevet.com'
Cc: Wieberg, Chris; John Everly
Subject: Trenton Farms LLC permit application

Mr. Simpson,

I am working on the permit for Trenton Farms. The owner listed on the application is Trenton Farms RE, LLC but several comments have been made that this is going to a Don Davis operation. I was wondering what involvement Mr. Davis will have in the operation of the CAFO. If he is a member of the LLC he would be considered an owner. The only thing this would change is this would not be an export only operation since some of the proposed land application fields are owned by Mr. Davis. If this is not export only operation then the regulatory requirements of the Missouri Concentrated Animal Feeding Operation Nutrient Management Technical Standard (NMTS) and record keeping requirements of the permit would be applicable to those fields.

My questions are:

- Is Mr. Davis a member of the Trenton Farms RE, LLC?
- If is his not, does Mr. Davis own the property the operation is to be built on?
- If he does, is Trenton Farms RE, LLC going to purchase the property?

If Trenton Farms RE, LLC purchase the property this would create a clearer line of separation between Mr. Davis and Trenton Farms RE, LLC if he is not a member.

Again, we are asking for this information to determine if the operation is export only and the applicability of the NMTS and recordkeeping requirements.

Thank you,

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102
(573)-526-1426
(573)-522-9920 (fax)

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Thursday, April 30, 2015 8:50 AM
To: Caldwell, Greg
Subject: Sean Simpson contact info

Phone 507-825-7174
ssimpson@pipevet.com

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Friday, May 29, 2015 11:59 AM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms RE, LLC clarification

Greg,

The owners of Trenton Farms RE, LLC inform me Don Davis will own no real estate at the Trenton Farms site, but will own 50% of the livestock operation. Will this qualify them as an export only operation?

Thank you

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

Caldwell, Greg

From: Caldwell, Greg
Sent: Friday, May 29, 2015 1:04 PM
To: 'John Everly'
Subject: RE: Trenton Farms RE, LLC clarification

If he has any ownership of the operation and the proposed land application fields, this would not be an export only operation.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
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From: John Everly [<mailto:jeverly@pinnacleiowa.com>]
Sent: Friday, May 29, 2015 11:59 AM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms RE, LLC clarification

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Caldwell, Greg

From: Caldwell, Greg
Sent: Monday, May 11, 2015 12:42 PM
To: John Everly
Subject: Trenton Farms
Attachments: MO602429P8000D.pdf

John,

I spoke with Mr. Simpson and he stated that Don Davis is a member of the LLC making him an owner. Because Mr. Davis owns land that is to receive manure this is not an export only operation and all land application fields owned by Mr. Davis are subject to all regulatory requirements and to the Nutrient Management Technical Standard (NMTS). I have reviewed the NMP submitted and have some comments based upon this information

- The soil tests used are from 2012 which is fine. However, the NMTS has requirements for soil sampling protocols that are to be followed. The NMTS requires that the field area represented by a soil sample to be approximately 20 acres or less. If this protocol was followed, please submit the soil test result for each sample. If this protocol was not followed, then new soil samples will need to be taken according to the NMTS requirements.
- The map for field MO602429P8000D needs to show the 100 foot setback for the classified stream. Please add the setback as identified in the attached map.

Processing of the application will resume upon receipt of the above information.

If you have any questions contact me.

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Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, June 03, 2015 5:27 PM
To: Caldwell, Greg
Subject: Trenton Farms installment 5
Attachments: Original_MMP_2015_2016_FarmerPlan.rtf; Original_MMP_2015_2017_FarmerPlan.rtf;
Original_MMP_2015_2018_FarmerPlan.rtf

First 3 years of NMP attached.

John Everly
The Pinnacle Group
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641-648-7300
jeverly@pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, June 03, 2015 5:23 PM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms 4th installment
Attachments: RUSLE 2 & P-Index Calculations.pdf

New RUSLE2/P-index calculations attached.

John Everly
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jeverly@pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, June 03, 2015 5:17 PM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms 3rd installment
Attachments: New Field Maps.pdf; Overview & Plat Maps.pdf

Maps attached.

John Everly
The Pinnacle Group
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641-648-7300

jeverly@pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, June 03, 2015 5:15 PM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms 2nd installment
Attachments: Don Davis Soil Sample Results Sec 29 & 30.pdf; Don Davis Soil Sample Results Sec 30.pdf

More soil sample results attached.

John Everly
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jeverly@pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, June 03, 2015 5:29 PM
To: Caldwell, Greg
Subject: Final installment for Trenton Farms
Attachments: Original_MMP_2015_2019_FarmerPlan.rtf; Original_MMP_2015_2020_FarmerPlan.rtf

These are the last 2 years of Trenton Farms 5-year plan. If some of these attachments did not come through or if you have questions, please let me know.

Thanks

John Everly
The Pinnacle Group
620 Country Club Road
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641-648-7300
www.pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Monday, June 15, 2015 10:27 AM
To: Caldwell, Greg
Cc: Brian Ritland; Sean Simpson; Dr. Steve Menke; dond
Subject: Trenton Farms RE

Greg,

Just as a follow-up to Thursday's public meeting, is there anything additional information you need from us?
Thanks

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

Caldwell, Greg

From: Caldwell, Greg
Sent: Monday, June 15, 2015 3:34 PM
To: Tippett Mosby, Leanne; Madras, John; Wieberg, Chris
Cc: Heaton, Michael; Crawford, Irene
Subject: Trenton Farms NMP

I have reviewed the NMP application rates for corn and soybeans. All fields but 2 are nitrogen based application which means they are applying enough manure to supply the amount of nitrogen needed by the crop. With nitrogen based applications the amount of phosphorous applied is nearly always more that the crop needs but this is allowed. When soil phosphorous levels or P index becomes high they must use a phosphorous based application in which they can only apply enough manure to supply the amount of phosphorous needed by the crop.

The corn fertilizer recommendations in the NMP ranges from 100 - 140 lbs./acre of nitrogen. These values seem to be low as the nitrogen recommendation in MU Extension Guide WQ202 is for 1.34 - 1.96 lbs. / bu. of corn. With the yield goal in the NMP of 122 bu. /acre the application rate would be 171 – 239 lbs. /acre of nitrogen. The maximum nitrogen application rate in the NMP is 154 lbs. /acre.

Soybeans – Because this is a legume and can fix its own nitrogen there is no nitrogen fertilizer recommendation. However, the NMTS does allow for the application of manure to supply the nitrogen removal rate for the expected yield of the legume crop. Nitrogen removal rates for soybeans in WQ202 are 3.75 – 4.84 lbs. /bu. For the yield goal in the NMP of 43.8 bu. /acre that would remove 164 – 212 lbs. /acre. The maximum nitrogen application rate in the NMP is 131 bu. /acre

I am not sure what is factored into the calculation for fertilizer recommendations for corn in the NMP, but based on the MU Extension guidance the application rates for corn and soybeans are within the requirements of the Nutrient Management Technical Standard.

I called John at Pinnacle and he said they recently started using a different program for application rates and he is not sure why there is a difference in the corn fertilizer recommendations. He said to let him know if anything needs to be revised. I also asked him about the person who stated they were going to apply on his property without permission. This was a comment that we also received. John said there was an error in the Grundy Co. Plat Book and it listed it as Don Davis's (Lae Z Coal) property. That property has been removed from the revised NMP.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
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Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, July 01, 2015 9:43 AM
To: Caldwell, Greg
Subject: RE: Trenton Farms RE

Ok, I should have the revisions to you sometime next week.
Thanks, Greg

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
Sent: Wednesday, July 01, 2015 9:26 AM
To: John Everly
Subject: RE: Trenton Farms RE

John,

I just wanted to clarify that the applications rates for corn are the only ones in question. The application rates for soybeans are ok.

Thanks.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
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(573)-522-9920 (fax)

Caldwell, Greg

From: Lance Whorton <lance.whorton@gmail.com>
Sent: Thursday, July 09, 2015 9:59 AM
To: Caldwell, Greg
Cc: porter.donna@epa.gov; Bonnie Ewing; Rich Kargel; Zane Whorton
Subject: Trenton Farms
Attachments: Trenton Letter .pdf

Please see the attached letter to the editor regarding the Trenton Farms CAFO permit request

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Friday, July 17, 2015 10:03 AM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms RE, LLC
Attachments: Original_MMP_2015-3_2016_FarmerPlan.rtf; Original_MMP_2015-3_2017_FarmerPlan.rtf; Original_MMP_2015-3_2018_FarmerPlan.rtf; Original_MMP_2015-3_2019_FarmerPlan.rtf; Original_MMP_2015-3_2020_FarmerPlan.rtf; 590 Appendix B Agronomic Crop Nutrient Removal Estimates.pdf

Greg,

Attached is a revised NMP for Trenton Farms RE, LLC, with re-calculated manure application rates. I will send the field maps in a following e-mail.

Some notes on the revised plan:

The new rates do not exceed nitrogen recommendations for corn in the plan's cropping system. In our projections, beginning in March 2018, the plan does show application to ground where soybeans are to be planted. However, the rates do not exceed 100 pounds of N per acre for soybean fields. We arrived at this number by referring to the Missouri Nutrient Management Technical Standard 590, Appendix B (attached.) Using a soybean yield goal of 43.8 bushels/acre multiplied by a nitrogen removal rate of 3.4 pounds/acre we find beans should remove about 148.92 pounds of N/acre. We limited our applications to 100 pounds of N per acre to allow for some nitrogen addition by the legume crop. In Iowa, nutrient management plans are limited by law to 100 pounds N/acre for soybeans and we have found this is a workable solution.

I hope this will address concerns about over-application of nutrients. If you have any questions please contact me.
Thank you

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Friday, July 17, 2015 10:09 AM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: Trenton Farms RE, LLC part 2
Attachments: Field Maps.pdf

Greg,

Field maps showing application areas for Trenton Farms attached. One other thing I would add to my comments is all the fields we are using for application are nitrogen-based management. One tiny field that scored High in the P-Index is not being used. Please let me know if you need anything else.

Thanks

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

Caldwell, Greg

From: Lee Ann <leeannsearcy@swbell.net>
Sent: Thursday, August 20, 2015 8:12 PM
To: Tippett Mosby, Leanne
Cc: Madras, John; Caldwell, Greg
Subject: Trenton Farms RE LLC extended comments

Importance: High

Leanne Tippett Mosby
Division Director
Missouri Department of Natural Resources

Ms. Mosby,

When will all of the additional comment letters be posted for our viewing on your website, or could we get those sent to us as well?

Thank you!
Lee Ann Williams Searcy
Hickory Neighbors United



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Caldwell, Greg

From: hickoryneighborsunited@gmail.com
Sent: Thursday, August 20, 2015 7:57 PM
To: Tippett Mosby, Leanne
Cc: Madras, John; Caldwell, Greg
Subject: Trenton Farms RE LLC Approved Permit and Revised Application

Importance: High

Leanne Tippett Mosby
Division Director
Missouri Department of Natural Resources

Ms. Mosby,

Please send a copy of the Trenton Farms RE LLC's approved permit and the revised application to Jeffery Law Group, LLC., sjeffery@jefferylawgroup.com and to Hickory Neighbors United hickoryneighborsunited@gmail.com and to Lee Ann Williams Searcy leeannsearcy@swbell.net. If we need to file a FOIA request, please let me know. Or if you need our mailing addresses please let me know that as well.

Please tell me the date that you issue the permit. Our letters were dated August 12th, saying it would be approved, but did not state when.

Awaiting your reply,
Lee Ann Williams Searcy
Hickory Neighbors United



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Caldwell, Greg

From: Wieberg, Chris
Sent: Friday, August 21, 2015 7:20 AM
To: Bouse, Nicci; Mills, Susan
Cc: Caldwell, Greg
Subject: FW: Trenton Farms Permit

I know we didn't direct either of you to do this but we need to get it done asap. Pleas assist Greg.

Thanks,

Chris Wieberg
Chief, Operating Permits Section
Water Protection Program
573-526-5751

From: Madras, John
Sent: Thursday, August 20, 2015 9:53 PM
To: Caldwell, Greg
Cc: Wieberg, Chris
Subject: Trenton Farms Permit

Greg, you probably have this in the works already, but could you check on the status of posting the issued permit and response to comments on the CAFO page?

Thanks.

Caldwell, Greg

From: Madras, John
Sent: Thursday, August 20, 2015 9:53 PM
To: Caldwell, Greg
Cc: Wieberg, Chris
Subject: Trenton Farms Permit

Greg, you probably have this in the works already, but could you check on the status of posting the issued permit and response to comments on the CAFO page?

Thanks.

Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Tuesday, May 12, 2015 11:14 AM
To: Caldwell, Greg
Cc: Don Davis; Dr. Steve Menke
Subject: RE: Trenton Farms

Greg,

What is the timeline on new soil samples? We believe some of the samples we now have may not comply with the NMTS. Is it possible to sample this fall, when the data would be more valid, and still permit the site in the interim?
Thanks

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
Sent: Tuesday, May 12, 2015 7:30 AM
To: John Everly
Subject: RE: Trenton Farms

Thanks for the map. I am out of the office the rest of the day but will call you tomorrow.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102
(573)-526-1426
(573)-522-9920 (fax)

From: John Everly [<mailto:jeverly@pinnacleiowa.com>]
Sent: Monday, May 11, 2015 3:25 PM
To: Caldwell, Greg
Cc: Dr. Steve Menke
Subject: RE: Trenton Farms

Greg,

Attached is a revised map for field MO602429P8000D showing a 100 foot buffer around the classified stream. I will get back to you on the soils.

Thanks

John Everly
The Pinnacle Group
620 Country Club Road
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641-648-7300
jeverly@pinnacleiowa.com

From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
Sent: Monday, May 11, 2015 12:42 PM
To: John Everly
Subject: Trenton Farms

John,

I spoke with Mr. Simpson and he stated that Don Davis is a member of the LLC making him an owner. Because Mr. Davis owns land that is to receive manure this is not an export only operation and all land application fields owned by Mr. Davis are subject to all regulatory requirements and to the Nutrient Management Technical Standard (NMTS). I have reviewed the NMP submitted and have some comments based upon this information

- The soil tests used are from 2012 which is fine. However, the NMTS has requirements for soil sampling protocols that are to be followed. The NMTS requires that the field area represented by a soil sample to be approximately 20 acres or less. If this protocol was followed, please submit the soil test result for each sample. If this protocol was not followed, then new soil samples will need to be taken according to the NMTS requirements.
- The map for field MO602429P8000D needs to show the 100 foot setback for the classified stream. Please add the setback as identified in the attached map.

Processing of the application will resume upon receipt of the above information.

If you have any questions contact me.

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Caldwell, Greg

From: John Everly <jeverly@pinnacleiowa.com>
Sent: Wednesday, June 03, 2015 5:12 PM
To: Caldwell, Greg
Cc: Brian Ritland
Subject: RE: Trenton Farms RE, LLC clarification
Attachments: Don Davis Soil Sample Results Sec19.pdf; Don Davis Soil Sample Results Sec 20 & 21.pdf

Greg,

Attached are revisions to the Trenton Farms RE, LLC Nutrient Management Plan. There is quite a bit of data so I will send in a few e-mails. Some of the new soil samples for Don Davis should be attached to this e-mail. More to come.

Thanks

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
Sent: Friday, May 29, 2015 2:40 PM
To: John Everly
Cc: Wieberg, Chris
Subject: RE: Trenton Farms RE, LLC clarification

We do have this situation in a few of our permits where the buildings are owned by one party and are lease to another party who owns/operates the operation. The definition of "Land application area" in the regulations states "Agricultural land which is under the operational control of the CAFO owner or operator..."

So in the situation as described this would not be an export only operation.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
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From: John Everly [<mailto:jeverly@pinnacleiowa.com>]
Sent: Friday, May 29, 2015 1:18 PM

To: Caldwell, Greg
Subject: RE: Trenton Farms RE, LLC clarification

Don Davis is not a member of Trenton Farms RE, LLC, which will own the barns and the land the barns sit on. Trenton Farms RE, LLC will lease the barns to Trenton Livestock. Don is a part-owner of Trenton Livestock, which will own the pigs.

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From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
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Caldwell, Greg

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Cc: Dr. Steve Menke
Subject: RE: Trenton Farms
Attachments: MO602429P8000D.pdf

Greg,

Attached is a revised map for field MO602429P8000D showing a 100 foot buffer around the classified stream. I will get back to you on the soils.

Thanks

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
Sent: Monday, May 11, 2015 12:42 PM
To: John Everly
Subject: Trenton Farms

John,

I spoke with Mr. Simpson and he stated that Don Davis is a member of the LLC making him an owner. Because Mr. Davis owns land that is to receive manure this is not an export only operation and all land application fields owned by Mr. Davis are subject to all regulatory requirements and to the Nutrient Management Technical Standard (NMTS). I have reviewed the NMP submitted and have some comments based upon this information

- The soil tests used are from 2012 which is fine. However, the NMTS has requirements for soil sampling protocols that are to be followed. The NMTS requires that the field area represented by a soil sample to be approximately 20 acres or less. If this protocol was followed, please submit the soil test result for each sample. If this protocol was not followed, then new soil samples will need to be taken according to the NMTS requirements.
- The map for field MO602429P8000D needs to show the 100 foot setback for the classified stream. Please add the setback as identified in the attached map.

Processing of the application will resume upon receipt of the above information.

If you have any questions contact me.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102
(573)-526-1426
(573)-522-9920 (fax)

Caldwell, Greg

From: Bloomer, Susan
Sent: Wednesday, May 27, 2015 11:30 AM
To: Mills, Susan; Caldwell, Greg
Cc: Wieberg, Chris
Subject: RE: trenton farm news release
Attachments: Trenton Farms CAFO.doc

Here's a starting draft for you to add to/edit.

Susan Bloomer
Missouri Department of Natural Resources
Water Protection Program
573-526-1825

Promoting, Protecting and Enjoying our Natural Resources. Learn more at dnr.mo.gov.

From: Mills, Susan
Sent: Wednesday, May 27, 2015 10:53 AM
To: Caldwell, Greg; Bloomer, Susan
Cc: Wieberg, Chris
Subject: FW: trenton farm news release

Hi Greg,

Can you answer these questions for Susan?

Also, Susan- here is a link to the info on the website for Trenton Farms if you need it (bottom of the page):
<http://dnr.mo.gov/env/wpp/cafo/index.html>

From: Bloomer, Susan
Sent: Wednesday, May 27, 2015 10:41 AM
To: Wieberg, Chris
Cc: Mills, Susan
Subject: trenton farm news release

Larry would like me to put together a news release about the public meeting in Trenton. Can you send me some details about the proposed farm? The more details, the better. If you already have an information sheet about it, send that.
How many acres are they proposing?
What kind and how many animals?
Location (X miles east of X on Hwy W in Grundy County)
Will APCP be at the meeting?

Susan Bloomer
Missouri Department of Natural Resources
Water Protection Program
573-526-1825

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If you have any questions contact me.

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Environmental Specialist
Missouri Department of Natural Resources
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Jefferson City, MO 65102
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Caldwell, Greg

From: Dohmen, Tony
Sent: Monday, April 20, 2015 10:21 AM
To: Caldwell, Greg
Cc: Sappington, Amanda
Subject: FW: Trenton Farms RE, LLC

FYI

From: Hutton, Shannon
Sent: Friday, April 17, 2015 1:19 PM
To: Dohmen, Tony
Subject: FW: Trenton Farms RE, LLC

I was going to forward this to one of our regional offices but the person who wrote the original email doesn't say where the proposed CAFO is going to be. Donna suggested I send this to you because you may know something about it. Please see the original email.

Thank you,

From: Mike Ford [<mailto:secpro39@yahoo.com>]
Sent: Friday, April 17, 2015 12:12 PM
To: DNR WEB Contact
Subject: Trenton Farms RE, LLC

Wambuguh, Dennis
Apr 16 at 11:22 AM

To
'SecPro39@yahoo.com'

CC
Luebbering, Joyce Baker, Anna Marie Wambuguh, Dennis

Dear Mr. Ford,

While odors could potentially be an issue in hog farms, DHSS is not in a position to comment on your statement that "insects, airborne chemicals and various forms of pathogens will increase dramatically in the area near the hog farm." As to whether they "create health hazards to people and cattle living in the vicinity", we do not have facts to support that assertion, more so because we do not know the scale of the proposed enterprise. That said, please note that hog farms are regulated by the Missouri DNR (depending on their size/number to be raised) and we recommend that you discuss with MDNR in the first instance to discuss your concerns.

Let me know if we can be of further assistance.

Regards,

Dennis Wambuguh

Dennis Wambuguh PhD., Unit Chief
Health & Risk Assessment
Bureau of Environmental Epidemiology
Missouri Department of Health and Senior Services
930 Wildwood Drive
Jefferson City, MO 65109
☎Office: (573) 751-6102; Fax (573) 526-6946
(Email: Dennis.Wambuguh@health.mo.gov)

Since the Environmental Water Protection Department of MO DNR is the sole reviewer/permit grantor of CAFOs in Missouri, the above email from DHSS, in effect, places the responsibility for Public Health and Safety on the MO DNR. Several health agencies, including the Center for Disease Control, have published reports on the hazards of CAFOs (see References below) to the public and the community. These reports should be integrated into the DNR review process for Trenton Farms RE, LLC. The reports may be accessed by doing a Google search on the report title and following the link to obtain the full report.

The management plan for Trenton Farms RE, LLC, submitted by Pinnacle, contains information on *how* to do things and what *should* be done, but very carefully avoids stating that Trenton Farms RE, LLC, *WILL*, in fact, do any of them, thus not requiring compliance with the plan. Based upon these facts and issues, Trenton Farms RE, LLC, should not be allowed to operate.

References:

“Understanding Concentrated Animal Feeding Operations and Their Impact on Communities” – National Association of Local Boards of Health; Carrie Hribar, MA – (CDC.gov)

“Impacts of CAFOs on Rural Communities” - John Ikerd

“Impacts of Waste from Concentrated Animal Feeding Operations on Water Quality” – Environmental Health Perspectives; JoAnn Burkholder, Bob Libra, Peter Weyer, Susan Heathcote, Dana Kolpin, Peter S. Thorne, and Michael Wichman

“CAFO: The tragedy of Industrial Animal Factories” -
http://www.cafothebook.org/thebook_myths_3.htm

“Health Effects of Airborne Exposures from Concentrated Animal Feeding Operations” – Environmental Health Perspectives; Dick Heederik, Torben Sigsgaard, Peter S. Thorne, Joel N.

Kline, Rachel Avery, Jakob H. Bønløkke, Elizabeth A. Chrischilles, James A. Dosman, Caroline Duchaine, Steven R. Kirkhorn, Katarina Kulhankova, and James A. Merchant

Sincerely,

Lawrence M. Ford
SecPro39@yahoo.com

Caldwell, Greg

From: Caldwell, Greg
Sent: Wednesday, May 13, 2015 10:39 AM
To: 'John Everly'
Subject: RE: Trenton Farms

Because the NMTS is incorporated into regulations, the NMP must be based on soil samples that meet those requirements. The permit cannot be issued until soil samples meet the requirement. Also, depending on results of the new soil test the larger fields may need to be broken up into smaller fields. If you have questions about this when you get new results let me know.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102
(573)-526-1426
(573)-522-9920 (fax)

From: John Everly [<mailto:jeverly@pinnacleiowa.com>]
Sent: Tuesday, May 12, 2015 11:14 AM
To: Caldwell, Greg
Cc: Don Davis; Dr. Steve Menke
Subject: RE: Trenton Farms

Greg,

What is the timeline on new soil samples? We believe some of the samples we now have may not comply with the NMTS. Is it possible to sample this fall, when the data would be more valid, and still permit the site in the interim? Thanks

John Everly
The Pinnacle Group
620 Country Club Road
Iowa Falls, IA 50126
641-648-7300
jeverly@pinnacleiowa.com

From: Caldwell, Greg [<mailto:greg.caldwell@dnr.mo.gov>]
Sent: Tuesday, May 12, 2015 7:30 AM
To: John Everly
Subject: RE: Trenton Farms

Thanks for the map. I am out of the office the rest of the day but will call you tomorrow.

Greg Caldwell
Environmental Specialist
Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102
(573)-526-1426
(573)-522-9920 (fax)

From: John Everly [<mailto:jeverly@pinnacleiowa.com>]
Sent: Monday, May 11, 2015 3:25 PM
To: Caldwell, Greg
Cc: Dr. Steve Menke
Subject: RE: Trenton Farms

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